



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

Douglas

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R.I. D.E.M.
AIR RESOURCES

July 15, 1999

Tom Budde
Environmental Advisor
Mobil Business Resources Corporation
1800 West Park Drive
Suite 450
Westboro, Massachusetts 01581

Re: Domed roof storage tank inspection frequency:

Dear Mr. Budde:

EPA has received your request for an interpretation of whether a domed tank with a floating roof and double seals should be considered an internal floating roof for the purpose of inspections under 40 C.F.R. § 60.112b(a)(1)(ii)(B).

You state that Mobil has a large light product storage and distribution terminal in East Providence, Rhode Island which has seven above-ground gasoline storage tanks that were originally constructed as external floating roof tanks and were then covered with geodesic domes in the mid 90's.

Based on a review of your submittal, the New Source Performance Standards for storage tanks Subpart Kb, and discussions with personnel at EPA Headquarters, the United States Environmental Protection Agency considers above-ground gasoline storage tanks fitted with geodesic domed roofs along with floating roofs with double seals to be internal floating roof tanks as described in 40 C.F.R. § 60.112b(a)(1)(ii)(B), for the purpose of inspections under 40 C.F.R. § 60.113b(a)(3).

The seven tanks located at the East Providence terminal are subject to subpart Kb and would therefore be subject to one of the following inspection intervals under 40 C.F.R. § 60.113b(a)(3):

Visually inspect the floating roof, primary and secondary seals and associated equipment every time the tank is emptied and degassed. In no event shall the interval of inspection exceed 5 years; or

Visually inspect the floating roof, primary and secondary seals through the manholes or roof hatches at least once every 12 months after initial filling of the tank. Visually inspect the floating roof, primary and secondary seals and associated equipment every time the tank is emptied and degassed. In no event shall the interval of inspection exceed 10 years.

It is our understanding that the current air permit for the East Providence terminal addresses inspections of external floating roof tanks. Mobil is advised that it should contact the Rhode Island Department of Environmental Management (DEM) in order to update your existing permit. This determination is being forwarded to the Rhode Island DEM.

If you have any questions concerning this determination, please feel free to contact Douglas Koopman, of my staff, at (617) 918-1747.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sam Silverman for".

Ira W. Leighton, Acting Director
Office of Environmental Stewardship

cc. Doug McVay, RI DEM